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CONFIDENTIAL

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Ex Parte Meeting

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Docket NHTSA-2000-8572 - 7

On January 24, 2001, NHTSA representatives met with representatives of the Rubber Manufacturers Association (RMA) concerning the impending rulemaking on tire pressure monitoring systems required by the recently-enacted Transportation Recall Enhancement Accountability and Documentation (TREAD) Act.

NHTSA was represented by Dion Casey, Nancy Bell, George Soodoo, Jonathan Walker, Joseph Scott, Chris Lash, Art Carter, Steve Peirce, Larry Blincoe, James Gilkey, Ray Owings, Joseph Kianianthra, H. Keith Brewer, and August Burgett. RMA was represented by Ann Wilson, Steve Butcher, Steve Pedula (Michelin), James Chen (Hogan & Hartson, representing Michelin), Dennis Candido (BFS), John E. Rumel (Goodyear Tire), Shahid A. Sherwani (Yokohama Tire), and Lyle Campbell (Cooper Tire).

RMA representatives distributed a position paper on tire pressure monitoring systems for passenger car and light truck tires. (Attached).

RMA Position
on
Tire Pressure Monitoring/Warning Systems
for
Passenger Car Tires and Light Truck Tires (Through Load Range E)

24 January, 2001

In response to Section 13 of the TREAD Act which requires a warning system in new motor vehicles to indicate to the operator when a tire is significantly underinflated we submit the following position statement.

A Tire Pressure Monitoring System/Low Tire Pressure Warning System (TPMS/LTPWS) must indicate to the operator when any tire (one or more) is **underinflated** when the actual inflation pressure falls below the placard pressure specified by the vehicle manufacturer.

A TPMS/LTPWS must warn the operator when any tire (one or more) is **significantly underinflated** when the actual inflation pressure falls below the minimum pressure specified by the tire industry standardizing body (TRA, ETRTO, JATMA, etc.) required to carry the actual load the individual tire is supporting, or the maximum load to be applied to the tire as determined by the vehicle manufacturer, or 150 kPa (22 psi), whichever is larger.

For vehicles equipped with run-flat tire systems, a TPMS/LTPWS must also provide a warning to the operator when the run-flat mode or condition is reached and is being utilized on any tire (one or more).

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RMA Position on Tire Pressure Monitoring/Warning Systems

24 January, 2001

- The correct tire size for a specific vehicle and the correct inflation pressure for that size tire on that vehicle should be shown on the vehicle's tire placard. For several reasons, including CAFE and optimum handling, a tire with less pressure than that shown on the vehicle's tire placard should be considered underinflated.
- Depending on the speed of the vehicle and the time or distance traveled, the integrity of a tire may be affected if the inflation pressure drops below the minimum pressure required to carry the actual load being applied and this tire should be considered significantly underinflated.
- Using a tire pressure monitoring system which activates at a pressure lower than this minimum pressure required to carry the vehicle load could result in tire damage.
- Using a tire pressure monitoring system which activates at a pressure lower than this minimum pressure required to carry the vehicle load would in effect be changing the load/pressure relationship for tires established by standardizing bodies throughout the world.
- The tire pressure selected by the vehicle manufacturer, and shown on the vehicle's tire placard, must be high enough to make certain that the system indicates when a tire is significantly underinflated, taking into account the accuracy and variability of the Tire Pressure Monitoring System selected by the vehicle manufacturer.
- When warning the operator of significantly underinflated conditions, any tolerance in the TPMS must not allow the actual pressure in the tire to go below what is required to carry the load on the tire.

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